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Attorneys for Defendant

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CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
RENO DIVISION

*ORDER*

CAROLYN ANNETTE SALIN,

No. 3:18-CV-00494-MMD-CBC

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

STIPULATION AND PROPOSED ORDER FOR  
A FIRST THIRTY-DAY EXTENSION FOR  
DEFENDANT TO FILE HER MOTION TO  
AFFIRM AND RESPONSE TO PLAINTIFF'S  
MOTION FOR REMAND

Defendant.

1           IT IS HEREBY STIPULATED, by and between Carolyn Annette Salin (Plaintiff) and  
2 Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their  
3 respective counsel of record, that Defendant shall have an extension of time of thirty (30) days to  
4 file her motion to affirm and response to Plaintiff's motion for remand. The current due date is  
5 March 27, 2019. The new due date will be April 26, 2019. This is Defendant's first request for  
6 an extension. The parties further stipulate that all other dates will be extended accordingly.

7           Defendant requests this extension because the attorney responsible for briefing this case is  
8 new to the office of the undersigned, requiring additional time for review by the undersigned  
9 attorney, who remains counsel of record. Moreover, because a supervisor in Defendant's Office  
10 of General Counsel is currently serving as a juror on a five-week trial, the undersigned attorney  
11 for Defendant has assumed shared responsibility for overseeing the office's program litigation  
12 workload throughout Nevada, California, Arizona, and Hawaii until approximately the second  
13 week of April. Finally, the attorney responsible for briefing the case for Defendant is currently  
14 out of the office on pre-scheduled annual leave, and has one additional district court brief in this  
15 Court to finalize upon his return and a second brief in the Southern District of California to write.

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1 For all these reasons, Defendant requires an additional 30 days to prepare and file her  
2 motion to affirm and response to Plaintiff's motion for remand. Plaintiff has no objection to this  
3 request. This request is made in good faith with no intention to unduly delay the proceedings.

4 Respectfully submitted,

5 DATE: March 25, 2019

s/ Cyrus Safa  
CYRUS SAFA  
Attorney for Plaintiff  
(by email authorization)

6  
7 NICHOLAS A. TRUTANICH  
United States Attorney

8 DATE: March 25, 2019

9 By s/ Daniel P. Talbert  
10 DANIEL P. TALBERT  
11 Special Assistant United States Attorney

12 Attorneys for Defendant

13  
14 ORDER

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 DATED: 3/26/2019

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19 THE HONORABLE CARLA BALDWIN CARRY  
20 UNITED STATES MAGISTRATE JUDGE